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December 21, 2017

**VIA ECF, E-Mail and Hand Delivery**

Honorable Kimba M. Wood  
Senior United States District Judge  
for the Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Steven Brown*,  
Docket No. 16 Cr. 436 (KMW)

**Letter Application Seeking The Court's Permission  
For Defendant Steven Brown To Travel  
To The Berlin Film Festival For Business Purposes**

Dear Judge Wood:

As likely anticipated from Monday's Conference, I write again as the attorney for defendant Steven J. Brown to seek the Court's permission for Mr. Brown to travel to Germany to attend The Berlin Film Festival from approximately February 12 until February 17, 2018.

As in his past international business travel and as expressed on Monday, his continuing purpose would be to engage in prospective and other media film business transactions, but, more specifically, to sell finished films that he has the authority to market. Although his film professional prospects have been devastatingly impacted by the criminal charges against him in this case, he must persist in this international travel if he is to continue in business with any chance of mustering the resources to stand up to the challenges of the criminal process. This international travel is essential to Mr. Brown's continuing livelihood.

Honorable Kimba M. Wood

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December 21, 2017

As I have always done, I communicated with government representatives, in this case with AUSAs Reilly and Solowiejczyk to determine the government's position on Mr. Brown's requested international travel. I was informed yesterday by AUSA Reilly that in light of the discussion in Court last Monday, the government takes no position on Mr. Brown's international travel request.

Now as before, I have also communicated with Mr. Brown's Pretrial Services Officer, Mr. Matthew Carter. As it always has, Pretrial Services takes no position on international travel but does note again for both the government and myself that Mr. Brown has always honored his commitments to Officer Carter and his Office.

I stand by to supplement this request as the Court requires.

Thank you again for your consideration of this travel request.

Respectfully submitted,



Walter Mack

cc: AUSA Katherine Reilly (by ECF and email)  
AUSA Noah Solowiejczyk (by ECF and email)  
PTSO Matthew Carter (by email)